

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

LOWER SUSQUEHANNA RIVERKEEPER
ASSOCIATION,

Plaintiff,

v.

FEDERAL HIGHWAY ADMINISTRATION,
U.S. Department of Transportation, SHAILEN
BHATT, Administrator, Federal Highway
Administration, and COMMONWEALTH OF
PENNSYLVANIA, DEPARTMENT OF
TRANSPORTATION,

Defendants.

Case No. 1:23-cv-00343

**FEDERAL DEFENDANTS’
MOTION FOR SUMMARY JUDGMENT**

Shailen P. Bhatt, in his official capacity as the Administrator of the Federal Highway Administration (“FHWA”), FHWA (Administrator Bhatt and FHWA collectively referred to as “Federal Defendants”), hereby move the Court to enter summary judgment in their favor.

Contemporaneous with this motion, the Federal Defendants will file a brief in support and statement of undisputed facts.

Respectfully submitted,

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Dated: April 29, 2024

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MIDDLE DISTRICT OF PENNSYLVANIA**

LOWER SUSQUEHANNA
RIVERKEEPER ASSOCIATION,

Plaintiff,

v.

FEDERAL HIGHWAY
ADMINISTRATION, *et al.*,

Defendants.

Civil No. 1:23-CV-00343

(Judge Wilson)

(Electronically Filed)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers. That on April 29, 2024, she served a copy of the attached

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by electronic service to the email addresses below:

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s/ Amanda J. Albert
Amanda J. Albert
Legal Administrative Specialist